

DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
Marshall S. Huebner
Benjamin S. Kaminetzky
James I. McClammy
Eli J. Vonnegut

*Counsel to the Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., et al.,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

NOTICE OF FILING OF PROPOSED ORDER GRANTING LATE CLAIM MOTIONS

PLEASE TAKE NOTICE that, on December 28, 2021, Wayne M. Miller [Dkt. No. 4294], and on January 3, 2022, Devin A. Pratt [Dkt. No. 4275], filed motions (the “**Late Claim Motions**”) seeking leave to have their personal injury proofs of claim (the “**Late Claims**”) deemed timely filed notwithstanding that the Late Claims were filed after the extended general bar date in these chapter 11 cases (the “**Extended General Bar Date**”).

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

PLEASE TAKE FURTHER NOTICE that in light of the fact that the Debtors contemplate that final resolution of these cases will involve a mechanism for compensating personal injury claims that are deemed to be timely filed and channeled thereto, the Debtors do not object to the relief sought in the Late Claim Motions. The Official Committee of Unsecured Creditors and the Ad Hoc Group of Individual Victims also consent to the relief sought in the Late Claim Motions.

PLEASE TAKE FURTHER NOTICE that the Debtors hereby file a proposed Order Granting Late Claim Motions (the “**Proposed Order**”). Pursuant to the Proposed Order, the Late Claims will be treated as timely filed, and the Debtors will not object to the Late Claims based on their not being filed by the Extended General Bar Date. The Proposed Order is attached hereto as **Exhibit A.**

PLEASE TAKE FURTHER NOTICE that a copy of the Proposed Order and all related papers may be obtained free of charge by visiting the website of Prime Clerk LLC at <https://restructuring.primeclerk.com/purduepharma>. You may also obtain copies of any pleadings by visiting the Bankruptcy Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

[Remainder of page intentionally left blank]

Dated: March 16, 2022
New York, New York

Respectfully submitted,

/s/ James I. McClammy
DAVIS POLK & WARDWELL LLP
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-5800
Marshall S. Huebner
Benjamin S. Kaminetzky
James I. McClammy
Eli J. Vonnegut

*Counsel to the Debtors
and Debtors in Possession*